

# Modern Slavery Statement

## 2025/26

### Who we are as an organisation

Hireup is an Australian NDIS-registered provider of disability support and aged care services, operating through an online platform where people with disability or those seeking aged care support can find, hire and manage support workers who fit their needs and share their interests.

At the time of reporting, the organisation had more than 6,400 clients and more than 7,100 Support Workers across Australia approved to use Hireup's platform. Hireup Support Workers are engaged as casual and permanent employees, to provide one on one support services to people with disability or those seeking aged care support. Hireup is a national company with 310 office personnel working across Australia.

This Statement is submitted on behalf of all operations of Hireup Holdings Pty Ltd (parent company) and its wholly owned subsidiary Hireup Pty Ltd, both of which are reporting entities. The two companies operate in the same sector and share suppliers. Hireup policies and procedures are applicable to both. Hireup Holdings Pty Ltd and Hireup Pty Ltd created this Statement in collaboration with each other and are herein referred to as "Hireup".

### Consultation

This Statement for the **2025 financial year period** was developed through consultation between both entities and discussions on: the Modern Slavery Act, potential actions to mitigate against modern slavery risks, reporting requirements, and how to raise awareness of modern slavery internally and externally to Hireup.

The CEO and Executive Leadership Team of Hireup Pty Ltd and the Board of Hireup Holdings Pty Ltd participated in the Statement's development. Input was received from key business units including Trust & Safety, Legal, Risk, and

Finance teams.

Combined oversight of the implementation of this Statement by the Hireup Pty Ltd Executive Leadership Team and the Hireup Holdings Pty Ltd Board ensures there is a consistent approach and commitment to its application across both companies.

## Our activities

Hireup's key supply chains are:

- the provision of disability and aged care support services by Hireup's Support Workers; and
- procurement of products and services for use by Support Office personnel.

## Our understanding of modern slavery risks for Hireup

Hireup's previous Statements have outlined the steps taken to understand the risk posed to Hireup by modern slavery. This has included supply chain mapping that considers geographic origins, pricing index, and total annual spend in assessing the risk of key suppliers.

Hireup's business operations remain largely unchanged since our last Statement. The organisation has continued to provide other disability sector providers with access to Hireup's Support Workers (**Providers Venture**). Hireup has also commenced delivering support work within the Aged Care sector working with individuals and with other third party aged care sector providers. Both these ventures may create some additional, albeit low modern slavery risks. These risks primarily involve the possibility that a third party provider utilising Hireup Support Workers may engage in discriminatory, unethical or illegal workplace practices such as wage theft, unsafe working conditions or exploitative labour practices.

Hireup is aware that financial pressures may increase the risk that other third party providers with whom we partner may seek to reduce costs by lowering standards. There is a clear link between economic pressure and worker exploitation. Hireup remains committed to only partnering with ethical and compliant third party support providers.

It remains our belief that the provision of support to people with a disability or those seeking aged care support, either directly through Hireup, or through our existing third party partner providers does not create a significant risk of modern slavery.

Despite this belief, we continue to monitor modern slavery risks in our procurement of goods and services, with particular focus on identified higher-risk areas such as cleaning and maintenance services, garments, and IT hardware and software.

## **How we are addressing modern slavery risks**

Hireup has continued to progress and mature the implementation of its modern slavery framework across both entities and has assessed the processes put in place in the previous reporting period to address modern slavery risks.

In the current period we have enhanced our monitoring procedures by implementing a formalised system to create individual threat intelligence risk reports in respect of each of our Tier 1 suppliers (our 32 most significant suppliers by spend). Based on publicly available information, these threat intelligence risk reports, assessed compliance with the Hireup Supplier Code of Conduct, confirmed policy maturity and validated the mitigation of all identified risk flags across the entire Tier 1 supplier base.

## **Changes to the Modern Slavery Act 2018 (Cth)**

Hireup is aware of the key changes proposed by Professor John McMillan AO, as part of the independent review of the *Modern Slavery Act 2018 (Cth)* (**Act**). Hireup acknowledges the government's commitment to strengthening the Act, including the proposed expansion of mandatory reporting criteria and the proposed introduction of a positive duty for entities to conduct due diligence.

Hireup specifically notes the establishment of the Australian Anti-Slavery Commissioner (Act No. 42 of 2024, enacted June 11, 2024), with a remit to promote compliance with the Act and support entities carrying on business in Australia to address risks of modern slavery practices in their operations and supply chains.

This section addresses and outlines how Hireup is meeting current compliance requirements, as well as how it is proactively moving to ensure alignment with key recommendations for proposed changes to strengthen the reporting regime for modern slavery.

- **Lowering the reporting threshold to \$50 million:** The proposed change will not impact Hireup Holdings Pty Ltd and Hireup Pty Ltd as the annual consolidated revenue in previous reporting years has been above the \$50M threshold.
- **Expanding the mandatory reporting criteria:** The review recommended updating and strengthening the reporting criteria in the Act so that entities are required to more explicitly describe their approach to managing modern slavery. The review proposed three key areas to strengthen reporting. These are listed below, along with a description of Hireup's current practices in this regard.

#### **1. Modern slavery incidents or risks identified by the entity during the reporting year**

The nature of our business, which is the provision of face-to-face disability and aged care service and support, means that most direct suppliers do not bring additional modern slavery related risks to the business. Suppliers and vendors largely provide administrative support, advice and consulting, banking and financial support, or technology support in terms of the provision of tools and systems and applications in use by the Hireup Support Office.

To assess the risks posed by relationships with third party providers, Hireup's Enterprise Risk Team undertakes an evaluation of all material suppliers. This evaluation includes ensuring that key suppliers have their own processes to manage modern slavery and have a published Modern Slavery Statement or a published statement on ethics or human rights.

The enhanced procedures undertaken in the current period to create individual threat intelligence risk reports in respect of each of our Tier 1 suppliers confirmed that all assessed Tier 1 suppliers are rated as Low Risk for the current reporting period. No material incidents or unresolved 'high-risk flags' were identified within the operations or the supply chains of these Tier 1 suppliers.

## **2. Grievance and complaint mechanisms made available by the entity**

Hireup remains committed to conducting business with fairness, integrity and respect for the law, and in accordance with its core operating principles and values. Hireup's Speak Up Policy codifies its position on whistleblowers. This policy is designed to ensure that customers, employees, clients and other stakeholders know how to disclose any wrongdoing and are able to raise concerns safely and securely, knowing all reports will be handled appropriately and protection will be afforded.

Hireup maintains an external whistleblowing process facilitated through an external third party provider; Stopline. Individuals with reasonable grounds to suspect "Reportable Conduct" - such as dishonest, fraudulent, corrupt, oppressive, illegal, or unethical behaviour relating to Hireup—can make a protected disclosure directly to Stopline.

Reports can be submitted 24/7 via multiple confidential channels, including a dedicated email address, a hotline number, an online portal, or by post.

Reports made to Stopline are then communicated to Hireup's designated Hireup Speak Up Protection Officer, and the whistleblower can choose to remain anonymous, with Hireup committed to ensuring they do not suffer any adverse conduct for making a disclosure under the Speak Up Policy.

In addition to the Speak Up Policy, Hireup also has both Complaints and Incident Reporting available via its platform and website, which enables anyone to register a complaint or report an incident.

## **3. Internal and external consultation undertaken by the entity on modern slavery risk management.**

As part of the annual review of Hireup's Modern Slavery Statement, internal consultation is undertaken with the leadership group and the Board to ensure that objectives and strategy are aligned with a zero-tolerance approach to modern slavery risks.

Consultation occurs with all potential suppliers or vendors prior to Hireup's engagement with them, to ensure they have an awareness of their

obligations under the Act as well as systems or processes in place to minimise their own modern slavery risks.

## Introducing a due diligence system obligation

The report tabled in Parliament contained the key observation that *"reporting should not be an end to itself"*, and that a due diligence system that went beyond the existing obligations was necessary to ensure greater compliance with the Act.

The steps that Hireup has taken to align with the proposed enhancements for a due diligence process are as follows:

- **Identify and assess the risks of modern slavery practices in its operations and supply chains:** Hireup manages the risk posed by modern slavery by undertaking an annual assessment of all vendors. This assessment takes into consideration the financial spend between the entities, the nature of the services between the entities (i.e. a review that identifies any supply chain issues or matters that might increase the risk that services may involve modern slavery practices), the entity's approach to modern slavery (including publication of a Modern Slavery Statement or similar), and their engagement with Hireup on managing modern slavery risks.
- **Take action to mitigate those risks:**
  - **Threat Intelligence Risk Reports for Tier 1 Suppliers:** The enhanced procedures undertaken in the current period to create individual threat intelligence risk reports in respect of each of our Tier 1 suppliers confirming that all assessed Tier 1 suppliers are rated as Low Risk for the current reporting period.
  - **Annual Modern Slavery Risk Assessment:** The objective of the risk assessment is to identify supplies or vendors that may pose an unacceptable risk of modern slavery practices. Should a supplier be identified as posing a higher than acceptable risk, the organisation would no longer engage the services of that supplier or vendor.
  - **Hireup's Procurement Policy (Policy):** The Policy continues to provide a comprehensive framework for sourcing strategies and purchasing processes. Our Policy ensures that all goods and services acquired by

Hireup are valid, fit for purpose, cost effective, and that they reflect our commitment to operate in a socially and ethically responsible manner. The Policy also ensures adequate levels of due diligence are conducted on new and existing suppliers to allow us to identify and manage any modern slavery risks and to provide us with a better understanding of how our suppliers actively manage their own modern slavery risks.

- **Track the entity's performance in mitigating the risks**

- **Reporting:** The results of our annual review of suppliers and vendors, including findings from the enhanced procedures undertaken in the current period in respect of our Tier 1 suppliers, are communicated to a number of key internal stakeholders:
  - i. The Finance team is apprised of any supplier or vendor that has not met our own internal criteria for engagement.
  - ii. Our Board and ELT are advised of any material changes in our supplier relationships that arise from that risk assessment.
  - iii. Where internal processes are found to be ineffective in controlling the risk of modern slavery, we undertake a review of those controls and their effectiveness and develop plans to strengthen those controls or develop new controls.
- **Systems and Tools:** Hireup's Enterprise Resource Planning tool enables the management of Supplier Approval Forms electronically. Supplier responses to modern slavery questions are recorded against their supplier profile in the ERP system. This enables Procurement to effectively monitor and report on supplier modern slavery answers and track supplier changes to these questions.

- **Explaining publicly how those processes are operating:** Hireup publishes the Modern Slavery Statement on its public facing website. The Statement is communicated to staff internally after the review and the publication of the Statement each year. Internal staff training on procurement also refers to the approach to managing modern slavery and supply chain related risks.

## **Our governance structure and continuous improvement**

Hireup has continued to utilise its management and governance structures to support the ongoing development of our Modern Slavery Statement. The Enterprise Risk Team maintains responsibility for the overarching strategy, direction, management and coordination of our modern slavery projects.

The Risk and Safety Committee of the Hireup Board monitors and reviews key risk areas within the business and assists and advises the Board on decision making around modern slavery risks. The Committee also oversees Hireup's continuous improvement in responding to these risks.

Hireup's Finance team delivers the Procurement function, with emphasis on managing all supplier onboarding, modern slavery questionnaires, supplier spending, supplier payments, sourcing activities, and supplier compliance with the Code.

## **Effectiveness**

Building on our previous Modern Slavery Statements, where risks associated with existing supply chains and operations were identified and assessed, Hireup has continued to monitor the effectiveness of its actions to improve its response and strengthen the organisation against the risks of modern slavery.

The enhanced procedures undertaken in the current period to create individual threat intelligence risk reports in respect of each of our Tier 1 suppliers enabled us to confirm that all assessed Tier 1 suppliers are rated as Low Risk for the current reporting period. Further, no material incidents or unresolved 'high-risk flags' were identified within the operations or the supply chains of these Tier 1 suppliers.

Other assessments to measure the effectiveness of our actions include:

- Continued monitoring of suppliers reviewed in previous years. This includes an assessment of their own positions on modern slavery including a review of their Modern Slavery Statements.
- Monitoring of both existing and new suppliers who completed, signed and returned Hireup's Supplier Approval form.
- Monitoring outcomes for actions taken on supplier risks.



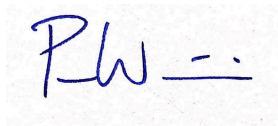
- Monitoring any modern slavery complaints received and reported to the Risk and Safety Committee and the Board (which have been nil at the time of writing this Statement).

## Emerging risks

In 2025, Hireup continued to review existing and new suppliers, using updated risk assessment processes, including the enhanced procedures undertaken in respect of our Tier 1 suppliers, enabling us to capture, document, and manage identified risks, possible risks, and emerging risks.

## Endorsement

This Statement was endorsed by Hireup Pty Ltd on **24 November 2025**



Peter Willis  
Chief Executive Officer

This Statement was approved by the Board of Hireup Holdings Pty Ltd on **24 November 2025**



Helen Souness  
Chair